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**Proposed Attorneys for Debtor**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>IN RE:</b>	§	
	§	
<b>NEW HOPE HOSPITALITY, LLC,</b>	§	<b>CASE NO: 12-31959-HDH-11</b>
	§	
<b>Debtor.</b>	§	<b>CHAPTER 11</b>
	§	

**EMERGENCY MOTION FOR USE OF CASH COLLATERAL**

**TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:**

COMES NOW NEW HOPE HOSPITALITY, LLC, the Chapter 11 Debtor in the above styled and referenced bankruptcy case (the “Debtor”), and files this its Emergency Motion for Use of Cash Collateral pursuant to 11 U.S.C. § 363 of the Bankruptcy Code and in support of same would respectfully show the following:

1. On March 30, 2012 the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code. The Debtor is now operating its business and managing its property as a debtor in possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code. No request has been made for the appointment of a trustee or examiner and no official committee has yet been appointed.

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of the Chapter 11 case and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. Debtor requests the Court to enter an Interim Order for Use of Cash Collateral in the form attached hereto as Exhibit "A."

4. Debtor has an immediate need to use the cash collateral of **EH NATIONAL BANK** (the "Bank"), the Debtor's primary secured creditor claiming liens on, among other things, the Debtor's real property, fixtures, equipment, inventory, and accounts receivables. The Debtor can adequately protect the interests of the Bank as set forth in the proposed Interim Order for Use of Cash Collateral by providing the Bank with a post-petition lien and a priority claim in the Chapter 11 bankruptcy case. The cash collateral will be used to continue the Debtor's ongoing operations, which includes owning and operating a hotel doing business as Hampton Inn & Suites located at 623 Bryans Way, Corsicana, Texas 75110. The Budget attached to the proposed Order permits the payment of ongoing operating expenses of the Debtor in order to allow the Debtor to maintain its operations in Chapter 11. The Debtor intends to reorganize its affairs and needs to continue to operate in order to pay its ongoing expenses, generate additional income and to propose a plan of reorganization in this case.

5. This is an emergency matter since the Debtor has no outside sources of funding available to it and must rely on the use of cash collateral to continue its operations.

6. This motion is supported by the Motion for Setting and Request for Expedited Hearing filed contemporaneously herewith.

WHEREFORE, PREMISES CONSIDERED, Debtor requests that the Court enter the Interim Order for Use of Cash Collateral in the form attached hereto as Exhibit "A." and for such other and further relief to which the Debtor may show itself justly entitled.

**DATED** April 3, 2012.

Respectfully submitted,

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PROPOSED ATTORNEYS FOR DEBTOR

By: /s/ Arthur I. Ungerman  
Arthur I. Ungerman  
SBN: 200391000

**CERTIFICATE OF SERVICE**

I hereby certify that on or before April 4, 2012 a true and correct copy of the foregoing document was sent by electronic filing to those persons receiving electronic notice, facsimile or first class, United States mail to the United States Bankruptcy Trustee and those persons on the attached Service List.

/s/ Arthur I. Ungerman  
Arthur I. Ungerman